

December 2, 2016

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of Invoking Forbearance Relief from Lifeline Broadband Obligation (WC
Docket No. 11-42

Dear Ms. Dortch:

Pursuant to the *Lifeline Broadband Order*¹ and the *Lifeline Broadband Forbearance Public Notice*,² this is to advise the Commission that Virgin Islands Telephone Corporation dba Innovative Telephone elects to avail itself of the forbearance relief provided for high-cost ETCs receiving frozen support.³ Innovative Telephone is an insular carrier that has elected to continue to receive frozen support, and the Commission has not yet established service obligations for the receipt of such support.⁴ Innovative Telephone also advises the Commission that, notwithstanding this forbearance relief, it will offer Lifeline-supported BIAS in some or all of the areas where forbearance is elected. Innovative Telephone makes this election now given the

¹ *Lifeline and Link Up Reform and Modernization, et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962 (2016) (“*Lifeline Broadband Order*”).

² *Wireline Competition Bureau Provides Guidance Regarding Filing Procedures for Eligible Telecommunications Carriers Seeking to Invoke Forbearance Granted by Lifeline Modernization Order*, WC Docket No. 11-42, Public Notice, DA 16-1316 (rel. Nov. 22, 2016) (“*Lifeline Broadband Forbearance Public Notice*”).

³ *Lifeline Broadband Order*, 31 FCC Rcd at 3974 ¶ 35.

⁴ *Connect America Fund, et al.*, Report and Order, 29 FCC Rcd 15644, 15662 ¶ 46 (2014) (“we conclude that the best approach is to adopt tailored service obligations for each of the non-contiguous carriers that elects to continue to receive frozen support amounts for Phase II in lieu of the offer of model-based support”). The Commission has not yet adopted such obligations for Innovative.

deadline because it has not yet determined where it will provide Lifeline broadband, and this determination will depend in part upon the ultimate broadband obligations that are applied to Innovative as an insular carrier electing to continue to receive frozen support. Given that the obligations have not yet been determined, Innovative files this notice as a matter of prudence given the current deadline.

Consistent with the Lifeline Broadband Forbearance Public Notice, the following information is provided:

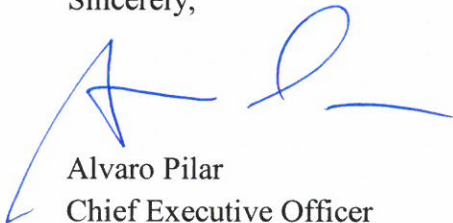
Carrier Name: Virgin Islands Telephone Corporation dba Innovative Telephone (“Innovative”)

ETC Designation Information: Innovative is an incumbent local exchange carrier designated by the Virgin Islands Public Service Commission (SAC 643300).

Areas Where Forbearance Is Sought: Innovative seeks forbearance from the Lifeline broadband obligation throughout its service territory in the Virgin Islands. An Excel spreadsheet of the Census Blocks is attached. However, as noted below, Innovative will nonetheless elect to provide Lifeline BIAS in some or all of these areas depending in part on the ultimate broadband service obligations that are applied.

Please direct any questions regarding this submission to the undersigned designated representative.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alvaro Pilar', is written over the printed name and title.

Alvaro Pilar
Chief Executive Officer

Attachment (spreadsheet)

cc: USAC (TelcoLifeline@usac.org)